

NOACA'S 208 PLAN POLICY TO CONSIDER DEVELOPMENT IMPACT OF PROPOSED WASTEWATER FPA MODIFICATIONS

**Policy Committee
July 12, 2019**

ACTION REQUESTED

No action is being requested. This item is for information and discussion.

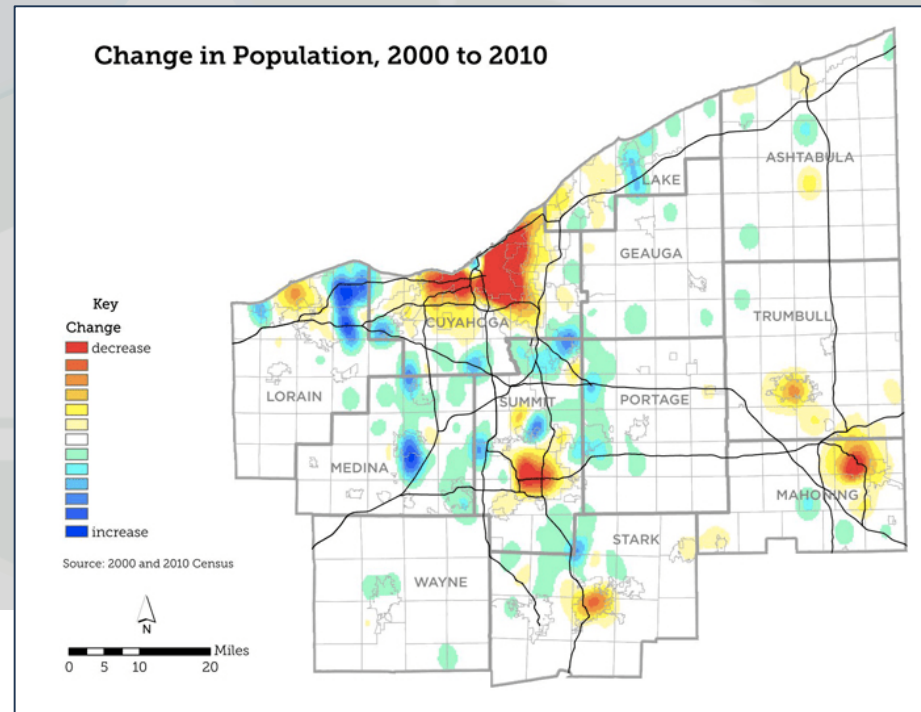
PREVIOUS ACTION

Discussion item at the April 2019 Policy Committee and June 2019 Water Quality Subcommittee meetings

POLICY COMMITTEE – APRIL 2019

Urban Sprawl FPA Policy Discussion Takeaways

- Should be a consideration factor
- May or may not impact the final decision
- Board's decision to determine if urban sprawl impacts are relevant



FPA MODIFICATIONS

FPA Boundary and Prescription Modifications

- Must be approved by NOACA's Board of Directors
- 53 FPA approved modifications since 2009
- 42% for new development

Current FPA Modification Policies

- Seven (7) policies (Chapter 4)
- Ensure consistency with 208 Plan principles
- Provide opportunity for comment from affected jurisdictions within the proposed modification area
- Guide NOACA staff, committees and Board of Directors

FPA MODIFICATION POLICES

Criteria Considered Under Current Policies

- Population forecasts
- Prescriptions
- Consensus among affected jurisdictions
- Sewer system(s) affordability and viability
- Ohio EPA permit or funding conditions
- Ability to provide sanitary sewers
- Technical feasibility
- Economic justification
- Legal authority
- Local economic harm

FPA MODIFICATION POLICIES

Not Explicitly Considered Under Current Policies

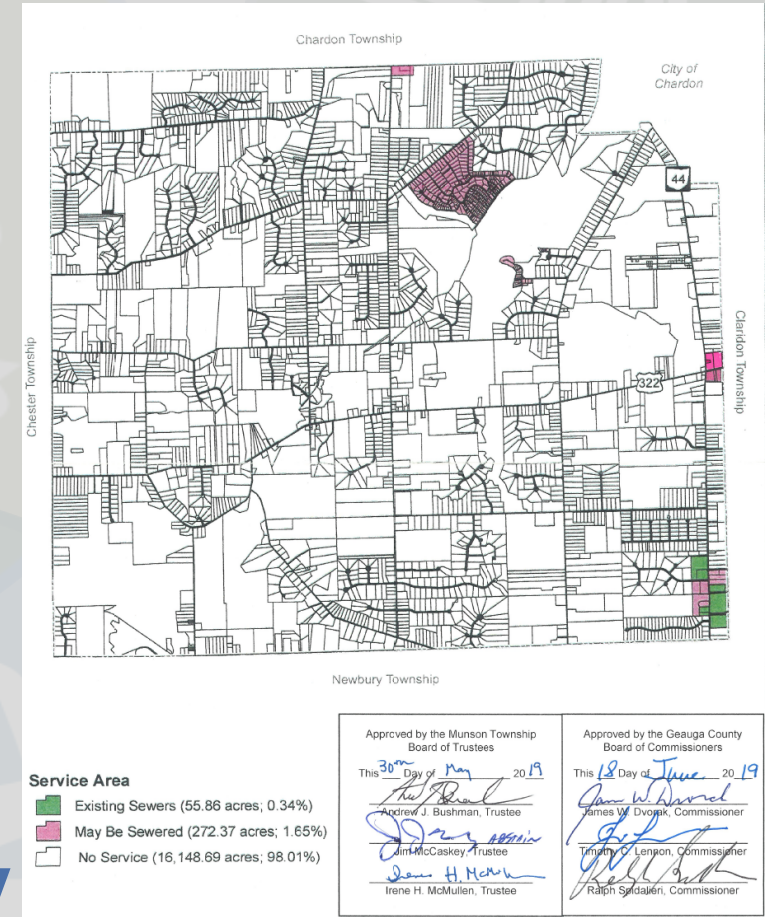
- Environmental or economic impacts related to urban sprawl
- Development vs. non-development impact of modifications
- Regional impacts (impacts beyond the modified FPAs)
- Planning documents (community master plans, watershed action plans, balanced growth plans, etc.)

Local Jurisdictions Can Apply More Stringent Wastewater Treatment Criteria with the Prescriptions for Wastewater Treatment



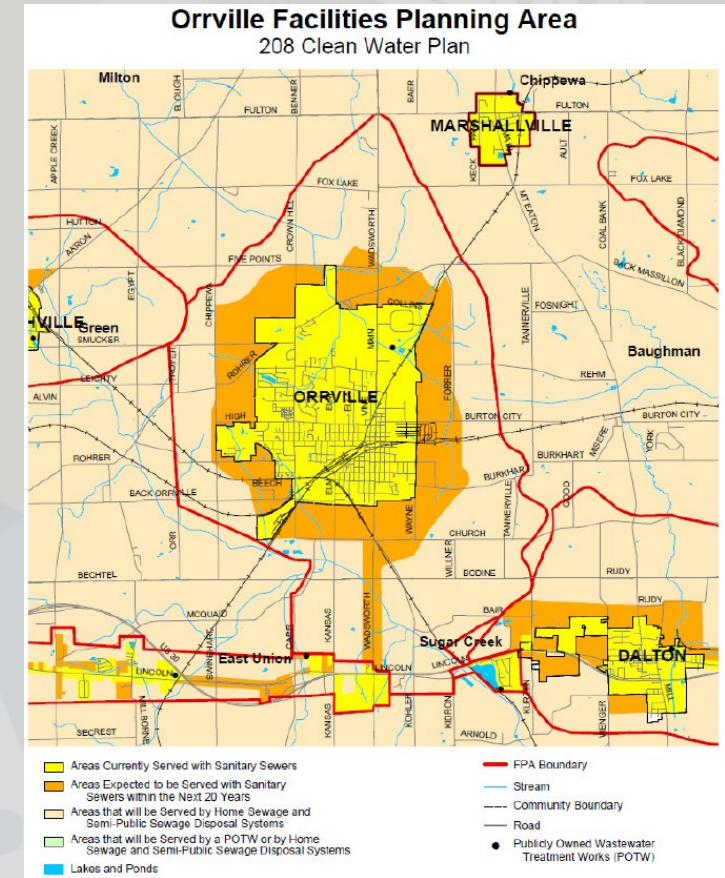
GEAUGA COUNTY

- Limits sanitary sewer extensions
- Parcel-level planning
- County imposed requirements prior to NOACA review:
 - Approval by the Board of Commissioners
 - Approval of the township(s) Board of Trustees
- NOACA policy only requires townships be notified and provided an opportunity to comment on FPA modifications



WAYNE COUNTY

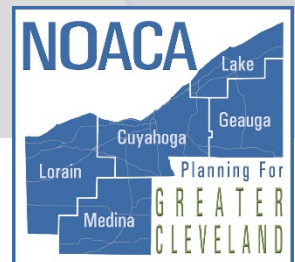
- Under NEFCO's 208 Plan and modification policies
- FPA utilized to help preserve rural character
- Two primary techniques:
 - Limit FPA boundaries to incorporated limits – Marshallville
 - Limit future sewer connections (orange) to small areas adjacent to existing sewers (yellow) – Orrville and Dalton



NEW 208 PLAN

Focus Group Relevant FPA Policy Recommendations

- FPA boundary modifications supported by local, regional or watershed planning efforts preferred (community master plans, watershed action plans, balanced growth plans, etc.)
- 5-year sewer extension timeframe (coincides with NOACA staff 5-year countywide FPA reviews)
- NOACA can consider local undue harm **against probable net benefits** of the FPA modification request
- Included an urban sprawl question in the wastewater decision makers questionnaire



WASTEWATER DECISION MAKERS QUESTIONNAIRE

NOACA should examine if a proposed FPA modification would further increase urban sprawl.

- Strongly Agree – 17%
- Somewhat Agree – 21%
- Neutral – 45%
- Somewhat Disagree – 8%
- Strongly Disagree – 9%
- 65 of 96 respondents as of June 20, 2019

WATER QUALITY SUBCOMMITTEE – JUNE 2019

Urban Sprawl FPA Policy Discussion Takeaways

- Region has excess wastewater capacity
- Reduce “infrastructure sprawl”
- Short-term vs. long-term costs
- Policy requires approval by Ohio EPA & USEPA
- Policy must be defensible
- Investigate an asset management component to a proposed policy

DISCUSSION

Potential Questions to Guide Staff Review:

- Is the proposed FPA modification within an Urbanized Area?
- Is the proposed FPA modification to serve proposed or anticipated new development?
- What type of land use(s) are within the proposed new development (e.g. residential, commercial, industrial, mixed?)
- What is the number of units or buildings proposed?
- What is current system capacity (conveyance and treatment)?

DISCUSSION

Potential Questions to Guide Staff Review (continued):

- How much new sanitary sewer infrastructure will be constructed (linear feet of sanitary sewer line, new pump stations, force main, etc.)?
- Is the proposed development supported by a comprehensive plan (e.g. community master plan, area plan, balanced growth plan, watershed action plan, etc.)?
- What are the long-term (20-year) maintenance costs?
- Is the proposed FPA modification part of an asset management plan?

NEXT STEPS

NOACA staff will:

- Continue to review the urban sprawl FPA policy issue; and
- Develop potential criteria and structure for an urban sprawl FPA policy





NOACA will **STRENGTHEN** regional cohesion, **PRESERVE** existing infrastructure, and **BUILD** a sustainable multimodal transportation system to **SUPPORT** economic development and **ENHANCE** quality of life in Northeast Ohio.

